

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

WILLIAM LEE GRANT II  
PLAINTIFF

FEDERAL QUESTION  
28 USC 1331

v CENTRAL INTELLIGENCE AGENCY  
SPECIAL COLLECTION SERVICE,  
+ [REDACTED]  
STATE OF ILLINOIS  
DEFENDANTS

WHAT ARE THE RAMIFICATIONS OF THE DOD KEEPING MR. GRANT IN ILLINOIS FOR NEARLY THIRTY (30) YEARS UNDER THREAT OF MILITARY FORCE?

CIVIL LIBERTIES COMPLAINT

- ① DISTRICT COURT HAS JURISDICTION PURSUANT TO 28 USC 1346(b)(1); 28 USC 1391(b)(1); 42 USC 1983; 42 USC 1985(3); AND 28 USC 1331.
- ② MR. GRANT HAS A CLAIM UNDER U.S. CONST. AMEND IV; U.S. CONST. AMEND V; U.S. CONST. AMEND XIII; [REDACTED] U.S. CONST. AMEND XIV; 42 USC 1983; AND 42 USC 1985(3).
- ③ THE STATE OF ILLINOIS WAIVED SOVEREIGN IMMUNITY BY CONSENTING TO 16-CV-3245 AND 17-CV-3261 BEING REMOVED TO THE ILLINOIS CENTRAL DISTRICT FROM THE SEVENTH CIRCUIT OF ILLINOIS.
- ④ THE ILLINOIS ATTORNEY GENERAL AND U.S. DEPARTMENT OF JUSTICE (DOJ) DEFAULTED AND FAILED TO DENY MR. GRANT'S ALLEGATIONS IN 16-CV-3245 AND 17-CV-3261.  
THE STATE OF ILLINOIS DEFAULTED IN 18-L-202 (ILLINOIS SEVENTH CIRCUIT OF ILLINOIS) ① AND FAILED TO DENY MR. GRANT'S ALLEGATIONS.



- (5) THE ILLINOIS CENTRAL DISTRICT HAS NOT FOUND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i);  
28 USC 1915(e)(2)(B)(ii);  
OR  
THIRTY-ONE (31) 28 USC 1915(e)(2)(B)(iii).
- (6) [REDACTED] FEDERAL DISTRICT COURTS HAVE NOT FOUND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i);  
28 USC 1915(e)(2)(B)(ii);  
OR  
28 USC 1915(e)(2)(B)(iii).
- (7) THE COMMANDER-IN-CHIEF [REDACTED] OF THE UNITED STATES ARMED FORCES (RONALD REAGAN) DIRECTED THE SECRETARY OF DEFENSE TO CREATE MR. GRANT TO PREDICT FUTURE NUCLEAR ATTACKS.
- (8) THE FUNDS TO CREATE MR. GRANT CAME FROM THE STRATEGIC DEFENSE INITIATIVE (MISSILE DEFENSE AGENCY).
- (9) THE OFFICE OF THE SECRETARY OF DEFENSE CREATED MR. GRANT, [REDACTED] IN 1990.  
AT AIR FORCE SYSTEMS COMMAND
- (10) THE OFFICE OF THE SECRETARY OF DEFENSE USED JOINT SPECIAL OPERATIONS COMMAND (JSOC) TO ENGINEER MR. GRANT'S LIFE TO GIVE CAUSE FOR [REDACTED] MR. GRANT TO APPEAR IN FEDERAL COURT.
- (11) THE OFFICE OF THE SECRETARY OF DEFENSE "DROPPED OFF" MR. GRANT IN SPRINGFIELD, ILLINOIS IN 1992 WITH DR. BILL GRANT AND ARMENTA JOHNSON TO BE: BEATEN; ENDURE PSYCHOLOGICAL WARFARE; AND THE U.S. DEPARTMENT OF DEFENSE'S WITNESS TO THE 9/11 TERRORIST ATTACKS.
- (15) THE OFFICE OF THE SECRETARY OF DEFENSE HAS COMMAND AUTHORITY OF THE U.S. MILITARY'S CONTINENTAL FORCES THROUGH THE U.S. NORTHERN [REDACTED] COMMAND [REDACTED]



- 12) GREGORY K. HARRIS LEFT THE PENTAGON IN THE EARLY 1990'S TO ILLEGALLY SURVEIL MR. GRANT THROUGH THE ILLINOIS CENTRAL DISTRICT U.S. ATTORNEY'S OFFICE.
- 13) GREGORY K. HARRIS BRIBED MR. GRANT'S FAMILY, PEERS, TEACHERS, CO-WORKERS, AND SUPERVISORS TO REPORT THE WORDS AND ACTIONS OF MR. GRANT TO GREGORY K. HARRIS.
- 14) GREGORY K. HARRIS DIRECTED MR. GRANT'S OPTOMETRIST TO GIVE MR. GRANT AN INCORRECT LENSE PRESCRIPTION TO DIMINISH MR. GRANT'S VISION WHEN MR. GRANT'S WAS IN 5TH GRADE (1995).
- 15) GREGORY K. HARRIS DIRECTED MR. GRANT'S [REDACTED] ORTHODONTIST TO DRILL THE ENAMEL OFF MR. GRANT'S TEETH FROM [REDACTED] 1999-2000.
- 16) WHEN MR. GRANT TURNED SEVENTEEN (17), MR. GRANT WAS FORCED TO STAY IN 2002, OR THE OFFICE OF THE SECRETARY OF DEFENSE WOULD SEND SOMEONE TO KILL DR. GRANT.
- 17) GREGORY K. HARRIS UNDERMINED MR. GRANT'S LEGAL DEFENSE FOR DOMESTIC BATTERY BY COLLUDING WITH MR. GRANT'S LAWYERS.
- 18) GREGORY K. HARRIS RECRUITED (THEN ILCD U.S. ATTORNEY) RODGER A. HEATON TO ILLEGALLY SURVEIL AND CONSPIRE AGAINST MR. GRANT. [REDACTED]
- 19) GREGORY K. HARRIS AND [REDACTED] RODGER A. HEATON RECRUITED NIVERSHA HILL TO ILLEGALLY SURVEIL AND CONSPIRE AGAINST MR. GRANT.
- 20) THE U.S. DEPARTMENT OF DEFENSE "BUGGED/HACKED" MR. GRANT'S CELLULAR PHONE, TELEPHONE, COMPUTER, AND KEPT MR. GRANT UNDER SATELLITE SURVEILLANCE FOR NEARLY THIRTY (30) YEARS.



(21) MR. GRANT WAS FORCED TO "ACT GAY" FOR MORE THAN SEVEN (7), OR THE U.S. DEPARTMENT OF DEFENSE WOULD HAVE SENT SOMEONE TO RAPE MR. GRANT.

(22) MR. GRANT HAD TO "ACT GAY" FROM THE END OF DECEMBER OF 2008 [REDACTED] UNTIL THE END OF 2016.

[REDACTED]

(23) IN 2009, THE U.S. DEPARTMENT OF DEFENSE (DOD), GREGORY K. HARRIS, AND THE ILLINOIS STATE POLICE (ISP) "SET-UP" MR. GRANT FOR A DRIVING UNDER THE INFLUENCE (DUI) CHARGE TO "STRIP" MR. GRANT OF HIS [REDACTED] DRIVER'S LICENSE.

(24) IN 2009, ISP TROOPER TYLER PRICE "STOPPED" MR. GRANT FOR AN ALLEGED IMPROPER LANE CHANGE.

(25) ISP TROOPER TYLER PRICE FAILED TO MIRANDIZE MR. GRANT, AND FAILED TO OBTAIN A WARRANT TO DRAW MR. GRANT'S BLOOD.

(26) ISP TROOPER TYLER PRICE ISSUED MR. GRANT MULTIPLE DUI TICKETS STEMMING FROM ONE TRAFFIC STOP.

(27) THE SANGAMON COUNTY STATE'S [REDACTED] ATTORNEY'S OFFICE FILED MULTIPLE DUI CASES AGAINST MR. GRANT STEMMING FROM ONE 2009 TRAFFIC STOP.

(28) MR. GRANT WAS SOBER.

(29) GREGORY K. HARRIS UNDERMINED MR. GRANT'S LEGAL DEFENSE BY COLLUDING WITH MR. GRANT'S LAWYERS (THE FIRMS: TIMONEY + PAGE AND SHARP + HARMON).

- MR. GRANT WAS HIRED BY THE STATE OF ILLINOIS IN 2011 TO GIVE THE ILLINOIS ATTORNEY GENERAL COUNSEL TO APPEAR IN COURT.
- 31 DEIRDRE 'D.K.' HIRNER MADE AN AGREEMENT WITH THE DOD IN THE EARLY 1990'S TO HIRE MR. GRANT IN THE FUTURE.
- 32 D.K. HIRNER (CHIEF OF STAFF) HIRED MR. GRANT IN 2011 AS A POLICY ANALYST IN THE OFFICE OF THE ILLINOIS LIEUTENANT GOVERNOR.
- 33 ANN L. SCHNEIDER MADE AN AGREEMENT WITH THE DOD IN THE EARLY 1990'S TO HIRE MR. GRANT IN THE FUTURE.
- 34 ANN L. SCHNEIDER (SECRETARY OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION) HIRED MR. GRANT IN 2012 AS A STAFF ASSISTANT WITH THE ILLINOIS DEPARTMENT OF TRANSPORTATION (IDOT).
- 35 MR. GRANT WAS RETALIATED AGAINST FOR FILING AN ETHICS COMPLAINT AND A CIVIL RIGHTS COMPLAINT WITH THE STATE OF ILLINOIS IN 2012.
- 36 MR. GRANT ENDURED A HOSTILE WORK ENVIRONMENT, WORK PRODUCTS BEING SABOTAGED, WORK HOURS BEING MODIFIED, GEOGRAPHIC REASSIGNMENT, BEING ASSIGNED WORK TASKS BELOW MR. GRANT'S PAY GRADE, AND A PROMOTION BEING RESCINDED.
- 37 IN 2014, MR. GRANT TRANSFERRED FROM IDOT TO THE ILLINOIS GOVERNOR'S OFFICE.
- 38 IN DECEMBER OF 2014, THE ILLINOIS GOVERNOR'S OFFICE FAILED TO ADD MR. GRANT TO PAYROLL.



- IN 2015, MR. GRANT WAS WRONGFULLY DENIED FEDERAL
- (39) UNEMPLOYMENT BENEFITS BY THE ILLINOIS DEPARTMENT OF EMPLOYMENT SECURITY.
- (40) IN 2015, MR. GRANT FOUND HIMSELF BLACKLISTED.
- (41) THE ACTIONS OF THE STATE OF ILLINOIS GAVE CAUSE FOR MR. GRANT TO APPEAR IN FEDERAL COURT.
- (42) THE ILLINOIS ATTORNEY GENERAL DEFAULTED AND FAILED TO DENY MR. GRANT'S ALLEGATIONS IN 16-CV-3245 AND 17-CV-3261.
- (43) ALAN D. BRENTS AND LARISSA M. YOUNG SEXUALLY ASSAULTED MR. GRANT IN 2003 AT THE DIRECTION OF GREGORY K. HARRIS.
- (44) THOMAS W. COATS AND JUSTIN CAJINDOS SEXUALLY ASSAULTED MR. GRANT IN 2014 AT THE DIRECTION OF GREGORY K. HARRIS.
- (45) THE DO D STOLE NEARLY THIRTY (30) YEARS OF MR. GRANT'S LIFE TO STATE AS FOLLOWS:
- (46) DONALD RUMSFELD GAVE A "STAND DOWN" ORDER ON 9/11 WITH THE CONSENT OF BUSH AND CHENEY.
- (47) DICK CHENEY LOBBIED FOR THE INVASION OF IRAQ TO GENERATE PROFITS FOR HALLIBURTON.
- (48) DICK CHENEY MADE \$100 MILLION FROM HIS HALLIBURTON STOCK DUE TO THE WAR IN IRAQ.
- (49) HILLARY RODHAM CLINTON KILLED VINCE FOSTER TO PREVENT VINCE FOSTER FROM TESTIFYING AT THE WHITEWATER HEARINGS.
- (50) HILLARY RODHAM CLINTON LOBBIED FOR THE 1994 CRIME BILL IN EXCHANGE FOR FUTURE CAMPAIGN CONTRIBUTIONS FROM THE PRIVATE PRISON INDUSTRY.
- (51) HILLARY RODHAM CLINTON RECEIVED THE CAMPAIGN CONTRIBUTIONS DURING THE 2016 PRESIDENTIAL GENERAL ELECTION.



HILLARY RODHAM CLINTON SENT AMBASSADOR J. CHRISTOPHER

52 STEVENS TO BENGHAZI, LIBYA AS A SUICIDE MISSION TO PREVENT THE AMBASSADOR FROM RELEASING A REPORT ADVOCATING THE DIVERSION OF FUNDS FROM IRAN TO LIBYA.

53 BILL CLINTON FIRED FEDERAL BUREAU OF INVESTIGATION DIRECTOR WILLIAM S. SESSIONS TO CONCEAL THE MURDER OF WHITE HOUSE COUNSEL VINCE FOSTER.

54 BILL CLINTON IS A SERIAL RAPIST.

55 BRUCE RAUNER BRIBED RAHM EMANUEL TO HIDE NATIONAL SECURITY REPORTS WHILE RAHM EMANUEL WORKED IN THE CLINTON WHITE HOUSE.

56 BRUCE RAUNER ASSISTED RAHM EMANUEL IN MAKING \$14 MILLION IN THREE YEARS UPON LEAVING THE CLINTON WHITE HOUSE. BRUCE RAUNER WENT ON TO MAKE HUNDREDS OF MILLIONS OF DOLLARS THROUGH DOD INFORMATION TECHNOLOGY.

57 PHILIP MOUNTBATTEN "ORDERED" THE ASSASSINATION OF DIANA, PRINCESS OF WALES. THE BRITS NEED LOOK AT MIE.

58 THE HOUSE SAXE-COBURG & GOTHA STANDS UNITED.

59 THE HOUSE OF SAUD WAS COMPLICIT IN THE 9/11 TERRORIST ATTACKS.

60 THE CIA ORCHESTRATED THE ARAB SPRING.

61 JAMES R. THOMPSON FAILED TO PROSECUTE RICHARD J. DALEY FOR PUBLIC CORRUPTION IN EXCHANGE FOR RICHARD J. DALEY SUPPRESSING THE DEMOCRATIC VOTE TO ALLOW THOMPSON TO BECOME GOVERNOR OF ILLINOIS AS A REPUBLICAN.

62 RICHARD M. DALEY KILLED CHICAGO MAYOR HAROLD LEE WASHINGTON AND BERNARD EPTON.

63 JAMES R. THOMPSON ASSISTED RICHARD M. DALEY CONCEAL THE MURDER OF HAROLD LEE WASHINGTON AND BERNARD EPTON.

64 RICHARD M. DALEY'S SALE OF CHICAGO'S PARKING METERS IS FRAUD.



(65) ANITA ALVAREZ, COOK COUNTY (ILLINOIS) STATE'S ATTORNEY [REDACTED] ENTERED INTO A CONSPIRACY TO ALLOW CHICAGO COPS TO SHOOT BLACK PEOPLE FOR SPORT WITHOUT FEAR OF CRIMINAL PROSECUTION.

(66) O.J. SIMPSON KILLED NICOLE BROWN-SIMPSON AND RON GOLDMAN.

(67) LOUIS FARRACHAN KILLED MALCOLM X.

(68) COURTNEY LOVE KILLED KURT COBAIN.

(69) MARTON HUGH "SUG" KNIGHT JR. KILLED CHRISTOPHER "BIGGIE SMALLS" WALLACE.

(70) MARTON HUGH "SUG" KNIGHT JR. BRIBED THE LOS ANGELES [REDACTED] POLICE DEPARTMENT TO CONCEAL SUG KNIGHT'S ROLE IN THE MURDER.

(71) THE CIA ORCHESTRATED THE ARAB SPRING.

(72) THE CIA KILLED JOHN F. KENNEDY.

PRESCOTT BUSH



[REDACTED] ALLEN DULLES



LYNDON B. JOHNSON

F. HOWARD HUNT'S 2003 CONFESSION IS VALID. HUNT'S BODY WAS FAILING, BUT HIS MIND WAS SOUND.

(73) HENRY KISSINGER IS A WAR CRIMINAL FOR HIS ROLE IN THE VIETNAM WAR, CAMBODIA, CHILE, AND ARGENTINA.

(74) CHRIS CHRISTIE WAS COMPLICIT IN THE FORT LEE LANE CLOSURE.

(75) THE CIA TRIANGULATED AGAINST [REDACTED] THE DOD TO USE THE DOD TO [REDACTED] FULFILL THE CIA'S MANDATE TO CONTAIN COMMUNISM IN SOUTHEAST ASIA.



76 OPERATION: HOMETOWN GLORY IS A SPECIAL COLLECTION SERVICE (U.S. DEPARTMENT OF DEFENSE) HUMAN INTELLIGENCE DOMESTIC BLACK OPERATION RUN UNDER THE BANNER OF THE U.S. DEPARTMENT OF JUSTICE.

77 THE SPECIAL COLLECTION SERVICE IS A "JOINT" ~~██████████~~ CENTRAL INTELLIGENCE AGENCY (CIA) AND NATIONAL SECURITY AGENCY (NSA) PROGRAM.

78 THE COMMANDER-IN-CHIEF OF THE U.S. ARMED FORCES HAS COMMAND AUTHORITY OF THE U.S. DEPARTMENT OF ~~██████████~~ DEFENSE AND CENTRAL INTELLIGENCE AGENCY.

79 THE OFFICE OF THE SECRETARY OF DEFENSE HAS COMMAND AUTHORITY OF THE U.S. DEPARTMENT OF DEFENSE.

80 THE CENTRAL INTELLIGENCE AGENCY IS LIABLE FOR THE ACTIONS OF THE SPECIAL COLLECTION SERVICE.

81 RES JUDICATA IS NOT APPLICABLE. THE U.S. DEPARTMENT OF JUSTICE HAS NOT FILED AN ANSWER IN 16-cv-3245, 17-cv-3261, AND 19-cv-3001. MR. GRANT'S LAWSUIT HAS NOT BEEN HEARD ON THE MERITS.

82 MR. GRANT'S WITNESSES

MICHAEL J. MADIGAN

JESSE WHITE

EMIL JONES

PATRICIA DAWSON

BARACK H. OBAMA

83 MR. GRANT SEEKS \$99 TRILLION IN DAMAGES.

84 THE DoD REMEMBERS 'NAM.



SDLA, SDGA, WDA, [REDACTED], EDWZ, ALND, ALSO, UTAH, NEW MEXICO  
 (85) THE ILND, ILCD, ILSD, [REDACTED], WDTX, NDTX, FEDTX, NDGA,  
 EDNY, NDWV, [REDACTED] WDMA, MARYLAND, NEBRASKA, [REDACTED], EDNC,  
 NORTHERN MARYLAND ISLANDS, C.F.C., AND FED. CIR.  
 HAVE NOT FOUND MR. GRANT'S ALLEGATIONS TO BE:

(86) THE NATIONAL SECURITY AGENCY  
 AND U.S. NORTHERN COMMAND ARE A  
 PART OF THE U.S. DEPARTMENT OF  
 DEFENSE. [REDACTED]

28 USC 1915(e)(2)(B)(i);  
 28 USC 1915(e)(2)(B)(ii);  
 OR  
 28 USC 1915(e)(2)(B)(iii).

(87) SHAWN CARTER IS THE BEST BIG BROTHER A KID  
 COULD ASK FOR.

(88) STEVE JOBS HAS A LARGE PENIS. STEVE JOBS HAS AN  
 ASHTON KUTCHER SIZE PENIS.

(89) THOMAS W. COATS HAS A SMALL PENIS. TOM HOPPER  
 DOES NOT.

(90) FREDDIE STROMA IS THE SAME SIZE AS TOM HOPPER.

(91) TONY BLAIR SAID, "ENGLAND'S NOT DOWN. IT'S IN  
 ENGLAND IS NEVER DOWN."

(92) NATHANIEL IS THE BEST FRIEND A GUY COULD ASK  
 FOR.

(93) WHEN YOU SEE "SALLY RIDE", IT STANDS FOR "RIDE,  
 MISTRESS, RIDE." D.K. HERNER IS THE MISTRESS.

(94) THE COMMANDER-IN-CHIEF AND OFFICE OF THE SECRETARY  
 OF DEFENSE HAVE COMMAND AUTHORITY  
 OF THE U.S. CONTINENTAL MILITARY  
 FORCES TO KEEP MR. GRANT IN  
 ILLINOIS UNDER MILITARY  
 FORCE THROUGH U.S. NORTHERN  
 COMMAND. (10)

W.L.G. 8/26/2019  
 William Lee Grant II  
 901 Wythe Road  
 Springfield, IL 62702



(95) ILSD JUDGES: ~~██████████~~ MICHAEL J. REAGAN (17-cv-1257); NANCY J. ROSENSTENGEL\* (18-cv-806); AND STACEY M. YANDLE\*\* DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).

\* (19-cv-979 + 19-cv-1104)  
 \*\* (19-cv-332)

(96) EDVA JUDGES: ROBERT E. PAYNE (18-cv-369); LIAM O'GRADY (18-cv-1328); LEONIE M. BRINKLEMAN (18-cv-449); AND ANTHONY J. TRENGA (18-cv-543) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).

(97) DISTRICT OF COLUMBIA JUDGES TANYA S. CHUTKAN (17-cv-1434); JAMES E. BOASBERG (18-cv-1162); RUDOLPH CONTRERAS ~~██████████~~ (18-cv-1805 + 18-cv-1806); AND CHRISTOPHER R. COOPER (18-cv-1804) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).

(98) ILND JUDGE VIRGINIA M. KENDALL (17-cv-7902) DID NOT FIND MR. GRANT'S ALLEGATIONS TO BE: 28 USC 1915(e)(2)(B)(i); 28 USC 1915(e)(2)(B)(ii); OR 28 USC 1915(e)(2)(B)(iii).

Will LJ 9/2/2019  
 WILLIAM LEE GRANT II  
 901 WYTHE ROAD  
 SPRINGFIELD, IL 62702  
 (217) 726-5269

(11)



99 THE HIV/AIDS VIRUS IS A WORLD WAR II - JAPANESE VIRUS UNLEASHED ON THE POPULACE TO GENERATE PROFITS FOR THE PHARMACEUTICAL COMPANIES.

100 THE HIV/AIDS "COCKTAIL" CAME FROM THE PENTAGON.

101 THE ILLINOIS ATTORNEY GENERAL FAILED TO DENY MR. GRANT'S ALLEGATIONS IN THE ILLINOIS COURT OF CLAIMS (18CC0946 + 18C1057).

102 MR. GRANT BEGAN HIS LAWSUIT IN MAY OF 2016 IN THE ILCD WITHIN THE STATUTE OF LIMITATIONS.

103 THE U.S. CENTRAL COMMAND IS A PART OF THE DoD, AND IS LOCATED IN TAMPA, FLORIDA.

104 THE MIDDLE DISTRICT OF FLORIDA HAS NOT FOUND MR. GRANT'S ALLEGATIONS TO BE:

28 USC 1915(e)(2)(B)(i),  
28 USC 1915(e)(2)(B)(ii), OR  
28 USC 1915(e)(2)(B)(iii),

105 THE OFFICE OF THE SECRETARY OF DEFENSE USED JOINT SPECIAL OPERATIONS COMMAND (JSOC) LAWYERS TO ENGINEER MR. GRANT'S LIFE TO APPEAR IN FEDERAL COURT.

106 JSOC IS A PART OF THE U.S. CENTRAL COMMAND, AND BOTH JSOC AND U.S. CENTRAL COMMAND ARE A PART OF THE DoD.

107 [REDACTED] 12 WILLIAM LEH GRANT II  
1/21/2020  
901 WITHE ROAD, SPRINGFIELD, IL 62702



EXHIBIT IN SUPPORT OF COMPLAINT  
GRANT II-  
V  
CIA ET AL.



STATE OF ILLINOIS  
OFFICE OF THE GOVERNOR  
SPRINGFIELD, ILLINOIS 62706

Pat Quinn  
GOVERNOR

August 2, 2010

Re: William Grant

To Whom It May Concern,

It is my pleasure to provide this letter of recommendation for William Grant. I am currently William's direct supervisor in Governor Pat Quinn's Office of Citizen Action. He has been an intern here since June 2010.

As a Constituent Affairs intern, William was responsible for managing constituent phone calls, opening and responding to letters, occasionally drafting public documents such as proclamations and newsletter articles and working on projects related to constituent outreach. He had the opportunity to become very familiar with state government and developed a solid understanding of the functions of many of the State agencies under the purview of the Governor.

Throughout the summer, he also managed the valedictorian celebration at the 2010 State Fair, which is an annual event attended by high school valedictorians throughout the state, as well as the Governor. He managed this project on his own and was solely responsible for the logistics of this major event as well as communicating with all participants.

William has been a very valuable asset not only to the Governor's Office of Citizen Action, but was helpful in other units within the Governor's Office as well. He is a team player and I believe he will be a great addition to your office. I do not hesitate to offer my recommendation.

Sincerely,

A handwritten signature in cursive script that reads "Donna Dalton".

Donna Dalton  
Director of Constituent Affairs



EXHIBIT IN SUPPORT OF COMPLAINT  
GRANT II

v  
CIA ET AL



SHEILA SIMON  
LIEUTENANT GOVERNOR  
STATE OF ILLINOIS

December 2, 2011

Re: Will Grant

Dear Friends,

It is with some sadness that I recommend Will Grant for your consideration as an employee. I am sad to do so because I will miss him on my staff.

Will has worked on my staff for almost a year now, and I have benefited greatly. He is open and engaging, traits which make him such a good person for the constituent contact he has on a daily basis. In addition to doing his work well, Will has the extra quality of being good to work with. I have consistently enjoyed my interactions with Will, whether it has been about the needs of constituents or about his crazy vegetable diet.

I should also add, because of our history as a state, Will should not be given any special consideration based on political connections or my recommendation. I write this letter as one employer to another employer. I ask that you consider Will and all of his qualifications, and I believe both you and he will be well served.

Thanks, and please feel free to call me if you have any questions.

Sincerely,

  
Sheila Simon  
Lt. Governor of Illinois

IDOT  
District 9 Headquarters  
Carbondale, IL 62903  
Phone: (618) 529-6452  
Fax: (618) 529-6455

714 State House  
Springfield, IL 62706  
Phone: (217) 558-3085  
Fax: (217) 558-3094  
TTY: 1 800-563-7110

JHFC, 15 205  
Chicago, IL 60601  
Phone: (312) 814-5240  
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EXHIBIT IN SUPPORT OF COMPLAINT  
GRANT II  
v  
CZAFET AL



STATE OF ILLINOIS  
**OFFICE OF THE GOVERNOR**  
SPRINGFIELD, ILLINOIS 62706

Pat Quinn  
GOVERNOR

December 21, 2014

To Whom It May Concern:

I am pleased to recommend Will Grant for employment. I have always known Will to be a skilled and dedicated public servant for the State of Illinois. His innate interpersonal skills and work ethic have earned him the respect and confidence of his colleagues.

Will is highly organized, mission oriented, and hard working. Will has proven himself to be an essential team member, and I am confident he will continue to be just that with his future employers.

I am certain that he will be an asset and make great contributions to your organization. If you have any additional questions regarding Will's experience or abilities, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Croke".

Ryan Croke  
Chief of Staff  
(847) 271-7926



# EXHIBIT IN SUPPORT OF COMPLAINT GRANT II

V  
CIA ETAL

Illinois Department of Employment Security  
Appeals - Springfield  
807 East Adams, 8th Floor  
Springfield, IL 62701  
Phone: (800) 244-5631 • TTY: (888) 205-3145  
www.ides.illinois.gov

WILLIAM L. GRANT  
901 WYTHE RD  
SPRINGFIELD, IL 62702-3428

Date Mailed: 03/10/2015  
Claimant ID: 2703013  
Docket Number: 1505989  
Appeal Filed Date: 02/03/2015  
Date of Hearing: 03/08/2015  
Type of Hearing: Telephone  
Place of Hearing: Springfield

## Administrative Law Judge's Decision

(Este es un documento importante. Si usted necesita un intérprete, póngase en contacto con el Centro de Servicio al Reclamante al (800) 244-5631)

Claimant Appellant  
WILLIAM L. GRANT  
901 WYTHE RD  
SPRINGFIELD, IL 62702-3428

Employer  
DEPT OF TRANSPORTATION DEPT OF  
TRANSPORTATION  
2300 S DIRKSEN PKWY  
SPRINGFIELD, IL 62764-0001

**Appearances/Issues/Employer Status:** The claimant and employer appeared and testified. Whether the Claimant left work voluntarily without good cause attributable to the employer? See 820 ILCS 405/601A. The employer is a party to the appeal.

**Findings of Fact:** The claimant worked for the employer as a technical manager/staff assistant in the legal department. He was paid about \$47,500 a year, began in 2012 and last worked on or about October 27, 2014. The claimant was advised in August of 2014 that the employer was going to lay him off at the end of September. The union filed a lawsuit and the layoff was postponed until the end of October of 2014. The claimant was then advised the layoff has been postponed indefinitely. The claimant was on a month to month lease. The landlord did not renew the lease for the month of November. The claimant returned to his hometown area in Springfield, stopped reporting to his Chicago employer work location and attempted to get a transfer through the Governor's office. The claimant reported to the Governor's office in constituent services in November and turned in time sheets for November 6, 7, and 10, 2015. The claimant was not paid and there was subsequent contact with this employer regarding pay and his work status. The claimant was ultimately not paid by this employer given he was not working for the employer and was not on its jobsite. The claimant submitted a resignation to the employer on November 21, 2014 effective November 5, 2014. The claimant did not submit any more time sheets to the Governor's office and on or about December 3, 2014 was advised a transfer was not approved there.

**Conclusion:** 820 ILCS 405/601A provides that an individual shall be ineligible for benefits for the weeks in which he has left work voluntarily without good cause attributable to the employing unit and, thereafter, until he has become reemployed and has had earnings equal to or in excess of his current weekly benefit amount in each of four calendar weeks.

The claimant quit his job in Chicago primarily due to issues with his living arrangements. There was also evidence he sought and believed he may have had another job. While the claimant may have had a good reason to quit, the leaving was not attributable to the employer as the employer did not materially change the terms of the working agreement. There was not sufficient evidence to support a finding of an exemption. The claimant was not hired at the Governor's office and was not paid any wages. While he testified that he worked at the Governor's office for a month, the claimant only submitted approximately three days of time sheets for payment (none of which were honored). The claimant is disqualified for benefits under Section 601A of the Act.

**Decision:** The Local Office Determination is AFFIRMED. Pursuant to 820 ILCS 405/601A, the claimant is disqualified for benefits. The claimant is not eligible for benefits from 11/30/2014.

JOHN SCHELLENBERG, Administrative Law Judge  
Appeals - Springfield  
Fax: (309) 671-3121

L11L

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APL011L

MR. GRANT QUALIFIED FOR FEDERAL BENEFITS  
PURSUANT TO 820 ILCS 405/601(B)(2).